

<b>Change Number</b> M-13-02-01	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <b>Do not use blue ink. Type or print using black ink.</b>	<b>Date</b> 2/11/2002
<b>Originator</b> P. M. Knollmeyer, Assistant Manager Central Plateau		<b>Phone</b> 376-7435
<b>Class of Change</b>  <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
<b>Change Title</b> Modification of the Central Plateau 200 Area Non-Tank Farm Remedial Action Work Plans (M-013 Series Milestones)		
<b>Description/Justification of Change</b>  <p>The Hanford Federal Facility Agreement and Consent Order (TPA) contains commitments for the U.S. Department of Energy (USDOE) to submit the 200 Area National Priority List (NPL) Remedial Investigation/Feasibility Study (RI/FS) Work Plans to complete the Investigation of Past-Practice Units by December 31, 2005 (Tri-Party Agreement Milestone M-013); complete all 200 Area Non-Tank Farm pre-Record of Decision (ROD) site investigations under approved work plan schedules by December 31, 2008 (Tri-Party Agreement Major Milestone M-015-00C); complete the remedial actions for all non-Tank Farm Operable Units by September 30, 2018 (Tri-Party Agreement Milestone M-016-00); and Submit Part B Permit Applications or Closure/Post Closure Plans for all Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units (M-020-00) by February 28, 2004.</p> <p>USDOE, the U.S. Environmental Protection Agency, and the State of Washington, Department of Ecology (parties) have completed negotiations to modify the schedule for completion of non-Tank Farm Remedial Investigations/Remedial Actions in the Central Plateau. These negotiations were conducted in accordance with the Tri-Party Agreement and the parties will provide the stakeholders/public the opportunity to review the proposed changes prior to approval. The parties agreed to a strategy for timely waste site remediation of the non-Tank Farm, RCRA corrective actions and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) past practice units for the Hanford Site Central Plateau.</p> <p>The parties signed an Agreement in Principle (AIP) that calls for the parties to complete negotiations and sign a Tentative Agreement by January 31, 2002, and commits the parties to complete public comment/review and agency approval by June 5, 2002.</p> <p>Continued on Pages 2 through 3.</p>		
<b>Impact of Change</b>  Accelerates the timetable to complete delivery of Work Plans. Reflects fewer work plans to cover same workscope.		
<b>Affected Documents</b>  The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and, if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).		
<b>Approvals</b>  <div> <div>_____</div> <div>K. A. Klein, RL Manager</div> </div> <div> <div>_____</div> <div>Date</div> </div> <div> <div>_____</div> <div>Approved</div> </div> <div> <div>_____</div> <div>Disapproved</div> </div>		
<div> <div>_____</div> <div>L. J. Iani, EPA Region 10 Administrator</div> </div> <div> <div>_____</div> <div>Date</div> </div> <div> <div>_____</div> <div>Approved</div> </div> <div> <div>_____</div> <div>Disapproved</div> </div>		
<div> <div>_____</div> <div>T. C. Fitzsimmons, Ecology Director</div> </div> <div> <div>_____</div> <div>Date</div> </div> <div> <div>_____</div> <div>Approved</div> </div> <div> <div>_____</div> <div>Disapproved</div> </div>		

**Description/Change (Continued)**

The M-013 series milestones includes schedules for the submittal of work plans for accomplishing necessary work to complete all 200 Area non-Tank Farm past-practice waste site investigations. The *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0*, established an approach for investigating the waste sites. Under this plan, approximately 700 waste sites were grouped into 23 process-based operable units (OUs), which in turn were grouped into 9 major waste categories (e.g., process waste, landfills). Each of the 23 OUs were scheduled in the TPA to have work plans developed under the M-013 series milestone. One OU was included in the *100 Area Remaining Sites Record of Decision*. For the remaining 22 operable units, the three agencies have jointly developed an improved approach for the completion of the RI/FS process and subsequent remediation of the waste sites based on lessons learned from Hanford's 100 and 300 Areas.

The revised investigation approach is to evaluate one or more OUs in a single RI/FS. This reduces the number of work plans, remedial investigation reports, and feasibility studies from 22 to 12. The revised approach is able to collect data necessary to adequately characterize the waste sites and evaluate effective remedial alternatives. Under this approach, all of the RCRA TSDs identified in the M-020 series milestones will be sampled to comply with RCRA Closure/Post Closure requirements. These improvements will be incorporated into a revision of the *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0*. Of the 12 RI/FS, 5 have approved work plans and 4 are in the final stages of the approval process. All completed work plans will be revised to reflect OU consolidation. The three remaining work plans will be completed under Tri-Party Agreement Major Milestones M-013-00M, M-013-00N, M-013-00O. Because the last work plan will be submitted under Tri-Party Agreement Milestone M-013-00O, the M-013-00P milestone is not required and will be deleted.

RI/FS Grouping of OUs	Major Waste Category	Work Plan Status	Approved Work Plans Requiring Modification
200-CW-1 Gable Mountain/B-Pond & Ditch Cooling Water Group*	Steam Condensate, Cooling Water and Chemical Sewer Waste (SC/CW/CSW)	Approved	X
200-TW-1 Scavenged Waste Group	Tanks/Scavenged Waste	Approved	X
200-TW-2 Tank Waste Group 200-PW-5 Fission Product-Rich Process Waste Group	Tanks/Scavenged Waste Process Condensate and Process Waste (PC&PW)	Approved	X
200-CW-5 U Pond/Z-Ditches Cooling Water Group	SC/CW/CSW	Approved	X
200-CW-2 S-Ponds/Ditches Cooling Water Group	SC/CW/CSW		
200-CW-4 T-Ponds/Ditches Cooling Water Group	SC/CW/CSW		
200-SC-1 Steam Condensate Group	SC/CW/CSW		
200-CS-1 Chemical Sewer Group	SC/CW/CSW	Approved	
200-PW-2 Uranium-rich Process Waste Group	PC&PW	App. In Process	
200-PW-4 General Process Waste Group	PC&PW		

RI/FS Grouping of OUs	Major Waste Category	Work Plan Status	Approved Work Plans Requiring Modification
200-PW-1 Plutonium/Organic-Rich Process Waste Group	PC&PW	App. In Process	
200-PW-3 Organic-rich Process Waste Group	PC&PW		
200-PW-6 Plutonium Process Waste Group	PC&PW		
200-LW-1 300 Areas Chemical Laboratory Waste Group	Chemical Laboratory Waste (CLW)	App. In Process	
200-LW-2 200 Areas Chemical Laboratory Waste Group	CLW		
200-MW-1 Miscellaneous Waste Group	Miscellaneous Waste	App. In Process	
200-IS-1 Tanks/Lines/Pits/Boxes Waste Group	Tanks/Lines/Pits/Boxes Waste	To be submitted	
200-ST-1 Septic Tank and Drain Fields Waste Group	Septic Tanks & Drain Fields Waste		
200-UR-1 Unplanned Release Waste Group	Unplanned Release	To be submitted	
200-SW-2 Radioactive Landfills and Dumps Group	Landfills & Dumps Waste	To be submitted	
200-SW-1 Non-Radioactive Landfills and Dumps Group	Landfills & Dumps Waste		
<i>*Includes 14 other 200 North Waste Sites</i>			

Modifications established by approval of this Tri-Party Agreement Change Request are denoted as ~~redline/strikeout~~ for deletions/modification and **shading** for new text.

Milestone	Description	Date
M-013-00M	Submit <b>3</b> 200 NPL RI/FS (RFI/CMS) Work Plans for the 200-IS-1, Tanks/Lines/Pits Diversion Boxes OU. Includes waste sites in the 200-ST-1, Septic Tank and Drain Fields OU	12/31/2002

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M-013-00N	Submit <del>3</del> 1 200 NPL RI/FS (RFI/CMS) Work Plans for the 200-UR-1, Unplanned Releases	12/31/2003
M-013-00O	Submit <del>3</del> 1 200 NPL RI/FS (RFI/CMS) Work Plans for the 200-SW-2, Radioactive Landfills and Dumps OU. Includes waste sites in the 200-SW-1, Non-Radioactive Landfills and Dumps OU	12/31/2004
<del>M-013-00P</del>	<del>Submit 4 200 NPL RI/FS (RFI/CMS) Work Plans</del>	<del>12/31/2005</del>